

EXHIBIT A



Service of Process Transmittal Summary

TO: Chuck Morici
FORD MOTOR COMPANY
1 American Rd
Dearborn, MI 48126-2798

RE: Process Served in Ohio

FOR: Ford Motor Company (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:	Re: TAYLOR HARRIS // To: Ford Motor Company
DOCUMENT(S) SERVED:	Summons, Complaint
COURT/AGENCY:	Lorain County Court of Common Pleas, OH Case # 22CV206176
NATURE OF ACTION:	Personal Injury - Vehicle Collision - 06/16/2022
PROCESS SERVED ON:	C T Corporation System, Columbus, OH
DATE/METHOD OF SERVICE:	By Traceable Mail on 06/21/2022 postmarked on 06/16/2022
JURISDICTION SERVED:	Ohio
APPEARANCE OR ANSWER DUE:	Within 28 days after service, exclusive of the day of receipt (Document(s) may contain additional answer dates)
ATTORNEY(S)/SENDER(S):	HENRY W CHAMBERLAIN CHAMBERLAIN LAW FIRM CO., L.P.A. 34790 Detroit Road, Suite 208 Avon, OH 44011 440-695-0150
ACTION ITEMS:	CT has retained the current log, Retain Date: 06/21/2022, Expected Purge Date: 06/26/2022 Image SOP
REGISTERED AGENT CONTACT:	C T Corporation System 4400 Easton Commons Way Suite 125 Columbus, OH 43219 877-564-7529 MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT



CT Corporation
Service of Process Notification

06/21/2022

CT Log Number 541782871

disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



TOM ORLANDO
Lorain County Clerk of Courts
225 Court Street - First Floor
Elyria, OH 44035-5512



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22CV206176
FORD MOTOR COMPANY
CT CORPORATION SYSTEM
4400 EASTON COMMONS WAY STE 125
COLUMBUS OH 43219

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LORAIN COUNTY COURT OF COMMON PLEAS

LORAIN COUNTY JUSTICE CENTER
225 COURT STREET
ELYRIA, OHIO 44035

TAYLOR HARRIS
403 NORTH LAKE ST
AMHERST, OH 44001

CASE NO. 22CV206176

VS.

TO: FORD MOTOR COMPANY
CT CORPORATION SYSTEM
4400 EASTON COMMONS WAY STE 125
COLUMBUS, OH 43219

SUMMONS ON COMPLAINT

You have been named defendant in a complaint filed in Lorain County Court of Common Pleas by plaintiff(s):

TAYLOR HARRIS
403 NORTH LAKE ST
AMHERST, OH 44001

A copy of the complaint is attached hereto. The name and address of the plaintiff's attorney is:

HENRY W CHAMBERLAIN
CHAMBERLAIN LAW FIRM CO., L.P.A.
34970 DETROIT RD SUITE 208
AVON, OH 44011

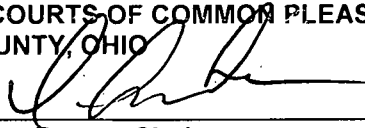
You are hereby summoned and required to serve a copy of your answer to the complaint upon the plaintiff's attorney, or upon the plaintiff, if he has no attorney of record, within **TWENTY-EIGHT (28) DAYS** after service of this summons on you, exclusive of the day you receive it. Your answer must **ALSO** be filed with this Court within three (3) days after you serve, (delivered or by mail), a copy of your answer on the plaintiff's attorney.

If you fail to appear and defend, judgment by default will be rendered against you for the relief demanded in the complaint.

TOM ORLANDO
CLERK OF COURTS OF COMMON PLEAS
LORAIN COUNTY, OHIO

6/15/2022

BY: _____


Deputy Clerk



FILED
LORAIN COUNTY

2022 JUN 10 P 12:11

IN THE COURT OF COMMON PLEAS
LORAIN COUNTY, OHIO

TAYLOR HARRIS
403 North Lake Street
Amherst, OH 44001

Plaintiff

v.

FORD MOTOR COMPANY
CT Corporation System
4400 Easton Commons Way
Suite 125
Columbus, OH 43219

And

FORD MOTOR COMPANY
805 Miller Road
Avon Lake, OH 44012

Defendants.

CASE NO.
JUDGE:

22CV206176

JUDGE D. CHRIS COOK

COMPLAINT

Jury Demand Endorsed Hereon

Now comes the Plaintiff, Taylor Harris, by and through counsel, and for her Complaint against Defendant, states as follows:

1. At all times relevant herein, plaintiff, Taylor Harris, was an employee of Defendant, Ford Motor Company (hereinafter "Ford") and was working at defendant's facility in Avon Lake, Ohio.

2. Plaintiff is and was, at all times relevant herein, a resident of Lorain County, Ohio.

3. Defendant Ford, owned, leased, maintained, inspected, repaired, operated and/or controlled the Ingersol-Rand 40 Volt Nutrunner ("Nutrunner" hereinafter) that was used by employees, including but not limited to the Plaintiff, within the course and scope of its business at its automobile manufacturing facility located at 805 Miller Road in Avon Lake, Ohio.

4. On or about June 16, 2020, Defendant Ford was the employer of Plaintiff, Taylor Harris, and caused tortious injury to her.

5. On or about February 16, 2020, Defendant Ford had a Nutrunner in operation upon its premises.

6. On or about June 16, 2020, Plaintiff, Taylor Harris, was operating the Nutrunner for its intended purposes, as instructed by her employer, and in the course and scope of her employment with Defendant Ford.

7. On the same date, Plaintiff was operating, in a normal fashion, said Nutrunner and was severely and permanently hurt by the unintended and inappropriate action of said Nutrunner, causing serious and permanent injuries to Plaintiff's right and dominant hand.

8. At all times herein mentioned, Defendant Ford, by and through its employees and supervisors, required Plaintiff to work with the Nutrunner without working safety guards in place and without other necessary safety equipment.

9. At all times herein mentioned, Defendant Ford knew that allowing an employee to operate the Nutrunner without proper working safety guards was done with an intent to injury the employee, or with the clear belief that injury was substantially certain to occur to employees, including the Plaintiff herein.

10. Despite this intent and/or knowledge, Defendant Ford instructed and/or required Plaintiff to work in these substantially dangerous and hazardous conditions.

11. At all times herein relevant, Defendant Ford did require and/or knew that Plaintiff was subjected to the hazardous and/or substantially dangerous activity of working with the Nutrunner with the lack of necessary safety guards, and that harm to the Plaintiff was certain to occur.

12. At all times herein mentioned, Defendant Ford acted with deliberate intent to cause an employee to suffer an injury, disease, condition, or death within the meaning of O.R.C. 2745.01. The tortious acts and/or omissions of Defendant Ford was thus malicious in that an injury and/or fatality was certain to occur as a result.

13. As a direct and proximate result of Defendant Ford's intentional and/or willful and/or wanton and/or deliberate acts and/or omissions, Plaintiff experienced extreme pain, suffering, mental and emotional trauma, and substantial economic loss.

14. As a direct and proximate result of Defendant Ford's conduct, Plaintiff was caused to suffer severe and permanent injuries, including but not limited to the traumatic mutilating power tool machine injury to the right index finger with significant involvement and open dislocated proximal interphalangeal joint, injury to her skin, soft tissues, muscles and tendons of her right hand.

15. As a direct and proximate result of Defendant Ford's intentional and/or deliberate acts and/or omissions, Plaintiff has suffered and will continue to suffer into the indefinite future from severe and permanent physical damage, pain and suffering, emotional distress, psychological agony, all of which will require psychological care and treatment.

16. As a direct and proximate result of Defendant Ford's actions and/or failure to act, Plaintiff has suffered lost wages, benefits, opportunities, and she will, with reasonable certainty, continue to suffer such losses into the indefinite future.

17. As a direct and proximate result of Defendant Ford's intentional and/or deliberate acts and/or omissions, Plaintiff has suffered a permanent loss of normal enjoyment of life.

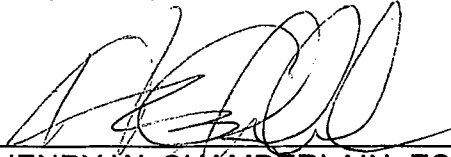
18. As a direct and proximate result of Defendant Ford's intentional and/or deliberate acts and/or omissions, Plaintiff has incurred medical expenses and will continue to incur further such expenses into the indefinite future.

WHEREFORE, Plaintiff, Taylor Harris, prays for judgment against the Defendant for compensatory and punitive damages in an amount in excess of TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00), together with reasonable attorney fees, litigation expenses, costs of this action and any other legal, equitable or declaratory relief deemed appropriate.

JURY DEMAND

Pursuant to Rule 38(B) of the Ohio Rules of Civil Procedure, Plaintiff hereby demands Trial by Jury.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'H. Chamberlain', written over a horizontal line.

HENRY W. CHAMBERLAIN, ESQ. #0046682

CHAMBERLAIN LAW FIRM CO., L.P.A.

34790 Detroit Road, Suite 208

Avon, OH 44011

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Fax: (440) 695-0154

Email: hank@chamberlain-law.com

Counsel for Plaintiff